UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE FOREIGN EXCHANGE BENCHMARK RATES ANTITRUST LITIGATION

No. 1:13-cv-07789-LGS

PROPOSED ORDER GRANTING RENEWED MOTION FOR ISSUANCE OF LETTERS ROGATORY

The Court, having reviewed Plaintiffs' Renewed Motion for Issuance of Letters Rogatory as well as the papers in support and opposition, HEREBY ORDERS THAT:

- 1. The Motion is GRANTED.
- 2. The Letters Rogatory attached as Exhibit A to the Declaration of Christopher M. Burke, dated June 4, 2020 are hereby issued as the Court's "Letters Rogatory" and are fully incorporated herein.
- 3. The signed Order and Letters Rogatory will be given to Scott+Scott Attorneys at Law LLP, Interim Co-Lead Counsel for Plaintiffs, who will cause both documents to be filed with the appropriate tribunal in Ireland.
- 4. The Stipulation and Order of Confidentiality (ECF No. 555) in this action shall apply to the deposition, including the transcript and video.
- 5. This Order, the deposition of Mr. Niall O'Riordan, or the terms of the Letters Rogatory (which are incorporated into this Order) shall not be construed or operate as a waiver of any argument, position, objection, allegation, or claim or defense of any party in the above-captioned action, or of the attorney-client privilege, the work product doctrine, or any other

privileges, rights, protections, or prohibitions that may apply to that evidence under the laws of the

Republic of Ireland, the United States, or the State of New York.

6. The parties will be subject to all safety guidance issued by this Court and the courts

of the Republic of Ireland with regard to the COVID-19 pandemic in order to ensure that the

deposition will proceed in a safe manner for the deponent, counsel, and other personnel.

IT IS SO ORDERED.

Dated: June 11, 2020

New York, New York

LORNA G. SCHOFIELD

UNITED STATES DISTRICT JUDGE